

REMARKS

Claims 1-10, 19-22, 24, 34, 36-37, 40, 42, 51, and 55-56 have been amended. Claim 39 and 57-59 has been canceled. No new claims have been added. Claims 1-56 are pending.

Please note that in the rejections based on 35 U.S.C. §§ 102(e) and 103(a), the Office Action erroneously refers to the Ajanovic patent as U.S. Patent No. 6,539,444 instead of U.S. Patent No. 6,516,375.

Claims 1-2, 16-20, 34-35, 38-40, 51-52, 55-57, and 59 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Ajanovic (U.S. Patent No. 6,516,375). Claims 3-15, 21-23, 36-37, and 41-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ajanovic in view of Frame (U.S. Patent No. 5,349,690). Claims 53-54 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ajanovic in view of Sing (U.S. Patent No. 6,609,171). Claim 58 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ajanovic in view of Rosen (U.S. Patent No. 6,346,828). These rejections are respectfully traversed.

Claim 1 recites, *inter alia*, "A bus arbitration method for ... system ... comprising a link bus, said link bus comprising a link bus hub and a plurality of link bus segments each link bus segment comprising a plurality of lines for communicating commands, addresses, data, and a single-bit link status signal, each link bus segment coupled to said link bus hub and one respective satellite device to form a point-to-point link between said link bus hub and respective satellite device, one of said respective satellite device being a first device, a processor coupled to said hub device via a processor bus, and a memory device coupled to said link bus hub by a memory bus, said method comprising the steps of: issuing, from one of the first device and the hub

device, an arbitration request on a portion of said plurality of lines associated with said single-bit link status signal of the link bus.”

Claim 19 recites, *inter alia*, “A method of arbitrating control of a link bus of a computer system, the link bus comprising a link bus hub and a plurality of link bus segments, each link bus segment comprising a plurality of lines for communicating commands, addresses, data, and a single-bit link status signal, each link bus segment coupled to said link bus hub and one respective satellite device to form a point-to-point link between said link bus hub and respective satellite device, said hub device coupled to a processor of said computer system by a processor bus and coupled to a memory device of said computer system by a memory bus, the link bus being a source strobed bus, said method comprising the steps of: time-multiplexing, from one of the satellite device and the hub device, an arbitration request signal on the single-bit link status line.”

Claim 34 recites, *inter alia*, “A ... system comprising: ... a link bus ... comprising a link bus hub and a plurality of link bus segments, each link bus segment comprising a plurality of lines for communicating commands, addresses, data, and a single-bit link status signal, each link bus segment coupled to said link bus hub and one respective satellite device to form a point-to-point link between said link bus hub and respective satellite device, one of said respective satellite device being a first device, said link bus hub being coupled to said processor via a processor bus; wherein said first device and said link hub arbitrate a control of said link bus by issuing, from one of said satellite device and said link hub, an arbitration request on a portion of said plurality of lines associated with said single-bit link status signal of the link bus.”

Claim 51 recites, *inter alia*, “A ... system comprising: a processor; a link bus, said link bus comprising a link bus hub and a plurality of link bus segments, each link

bus segment comprising a plurality of lines for communicating commands, addresses, data, and a single-bit link status signal, each link bus segment coupled to said link bus hub and one respective satellite device to form a point-to-point link between said link bus hub and respective satellite device, one of said respective satellite device being a first device, said link bus hub being coupled to said processor via a first bus; wherein said first device multiplexes an arbitration signal on a portion of said lines associated with said single-bit link bus status signal ... to become a master of said link bus during transmissions to said link hub, and said link bus hub multiplexes another arbitration signal on said portion of said lines associated with said single-bit link bus status signal ... to become a master of said link bus during transmissions to said first device.”

Ajanovic discloses a method and apparatus for a PC utilizing a hub based interface to emulate a PCI-bus based interface. Referring to Fig. 1, the Office Action alleges that the MCH 120 corresponds to the link bus hub, and links HI A, HI B, HI C, and HI D correspond to the link bus segments, and bridge 127 and ICH 140 correspond to the link bus agents. It is respectfully submitted that this conclusion is in error with respect to links HI C and HI D. In independent claims 1, 19, 34, and 51, each segment of the link bus recite “to form a point-to-point link between said link bus hub and respective satellite device.” Links HI C and HI D do not couple devices 143 and 145 to the MCH 120 via any point-to-point links to the MCH 120, and thus cannot correspond to the recited point-to-point links.

Claims 1, 19, 34, and 51 additionally recite that each link bus segment comprises “a plurality of lines for communicating commands, addresses, and data, and a single-bit link status signal,” and that the method includes the step of “issuing ... an arbitration request on a portion of said plurality of lines associated with said single-bit link status signal of the link bus” (claims 1 and 34) or “time-multiplexing, from one of the satellite device and the hub device, an arbitration request signal on the single-bit

link status line” (claim 19), or “said first device multiplexes an arbitration signal on a portion of said lines associated with said single-bit link bus status signal ... to become a master of said link bus during transmissions to said link hub, and said link bus hub multiplexes another arbitration signal on said portion of said lines associated with said single-bit link bus status signal ... to become a master of said link bus during transmissions to said first device” (claim 51).

Ajanovic in fact discloses using two independent status signals, namely RQA and RQB. With respect to any two devices in Ajanovic’s system, (e.g., a hug agent and a hub), one device is known as device A and the other device is known as device B. Each device has its own outgoing arbitration request line (i.e., RQA for device A and RQB for device B) for requesting an arbitration request. Column 10, line 5 – column 12, line 30; See Table 3 (columns 10-11); See Fig. 11. Since RQA and RQB are independent signals they cannot correspond to the claimed “single-bit link status signal” because the combination of these two independent signals RQA, RQB encode 2 bits of information. Ajanovic is required to utilize multiple arbitration signal lines because Ajanovic awards arbitration to the first device which requests the bus, thereby requiring a multi-bit status information, as a single bit signal cannot differentiate between the four possible states which arise when two devices are competing in a race (i.e., devices A and B both do not request arbitration, device A requests arbitration first, device B request arbitration first, devices A and B request arbitration simultaneously). See Column 8, lines 48-49.

Accordingly, Ajanovic cannot be fairly stated to disclose or suggest the subject matter recited in independent claims 1, 19, 34, and 51.

The Office Action further cites to Frame, Rosen, and Sigh. Each of these references, however, fail to supply any teaching or suggestion, which when taken

individually or in combination, discloses or suggest the claimed invention. More specifically:

Frame discloses a bus system in which individual bus devices are assigned a fixed priority and the highest priority device wins arbitration. Column 2, line 29-31 and 49-51. However, Frame does not even disclose a hub based bus system, and therefore cannot disclose or suggest the recited "link bus." Frame further does not disclose the use of the claimed "single-bit link status signal."

Singh discloses a conventional multi-drop bus system which supports a quad pumped bus architecture and protocol. Referring to Fig. 1, it can be seen that Singh's computer system 100 utilizes a conventional non-hub based system interface 116, utilizing multiple I/O interfaces 118, controllers 120, and bridges 124 to facilitate communication between various devices and the processors 110, 112, 114.

Rosen discloses a pulsed clock controller which generates a tristate signal. The pulsed clock controller can be used in a tri-state bus. However, Rosen also does not disclose or suggest a hub based bus system, nor does Rosen disclose the claimed "single-bit link status signal."

Thus, none of the additional references (i.e., Frame, Singh, and Rosen), whether taken individually, or in combination, discloses or suggest the above quoted limitations of independent claims 1, 19, 34, and 51.

Independent claims 1, 19, 34, and 51 are believed to be allowable over the prior art of record. The depending claims, i.e., claims 2-18, 20-33, 35-38, 40-50, 52-56 are also believed to be allowable for at least the same reason as the independent claims.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Dated: December 27, 2004

Respectfully submitted,

By 

Thomas J. D'Amico

Registration No.: 28,371

Christopher S. Chow

Registration No.: 46,493

DICKSTEIN SHAPIRO MORIN &
OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorneys for Applicant